

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DOMINIKA ZAKRZEWSKA :  
Plaintiff, : 06 Civ. 5463 (LAK)  
v. : NOTICE OF MOTION  
: FOR A PROTECTIVE ORDER  
THE NEW SCHOOL and :  
KWANG-WEN PAN, :  
Defendants. :  
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PLEASE TAKE NOTICE, that upon the Declaration of Jason L. Solotaroff, dated December 18, 2007, Plaintiff will move this Court before the Hon. Lewis A. Kaplan, at the United States Courthouse located at 500 Pearl Street, New York, New York, on a time and date to be determined by the Court, for an Order compelling discovery and for any other relief that the Court considers just and proper.

Dated: December 18, 2007  
New York, New York

Respectfully submitted,

GISKAN, SOLOTAROFF & ANDERSON LLP

/s/

Jason L. Solotaroff (JS-5739)  
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